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First name: D. Brady
Last name: Green
Organization:
Title:
Comments: Comments on April 22, 2022, North Fork Stillaguamish Landscape Analysis Project Scoping Letter, Mt. Baker-Snoqualmie National Forest (MBS-NF), Darrington Ranger District
D. Brady Green, May 21, 2022
Subject: North Fork Stillaguamish Landscape Analysis Project
Greta Smith, District Ranger, Darrington Ranger District, 1405 Emens Ave. North, Darrington, WA 98241
Dear Greta,
Thank you for the opportunity to provide comments on proposed North Fork Stillaguamish Landscape Analysis Project. I worked on the Mt. Baker Ranger District as a fisheries biologist starting in 1984 until retirement in 2003, and I am very familiar with the Deer Creek watershed as well as the North Fork Stillaguamish River system. One of my first field trips on the MBS-NF in 1984, was to the DeForest Creek to observe the devastating landslide. Following are my general and specific comments on the April 22, 2022, North Fork Stillaguamish Landscape Analysis Project Scoping letter.
General Comments
Northwest Forest Plan (NWFP) Tier 1 Key Watershed
There was no mention that both the North Fork Stillaguamish River and Deer Creek watersheds were designated as Tier 1 Key Watersheds in the NWFP. The NWFP is mentioned once in the scoping document, however, not acknowledging that both of these watersheds are Tier 1 Key Watersheds is a serious error.
Based on the NWFP Record of Decision (ROD) Standards and Guidelines, and the Aquatic Conservation Strategy (ACS), a watershed analysis is required for any type of restoration, timber harvest, road work, etc., in a Tier 1 Key watershed and in Riparian Reserves. The project scoping area includes watersheds that had watershed analyses conducted many years ago. The North Fork Stillaguamish Watershed Analysis (excluding Deer Creek) was completed in 2000 and the Deer Creek Watershed Analysis was completed in 1996. Many land management activities have occurred in this project area since then making these old watershed analyses badly out of date. At a minimum these watershed analyses should be updated or amended to reflect these changes.
Washington Department of Fish and Wildlife (WDFW)
Based on my review of recent MBS-NF projects (NF Nooksack Vegetation Management EA, Deadhorse Road Relocation EA, etc.), I am concerned that WDFW, one of the two co-managers of fish and wildlife in Washington State, will be left out of the planning process. Based on these other projects only the tribes, the other co-managers, were involved. The USFS manages the fish and wildlife habitat on National Forest lands, however, the WDFW manages the fish and wildlife populations, so it is critical that WDFW be closely involved in the planning process for this project.

Increasing Large Woody Debris (LWD) Components to Improve Habitat & Function - Felling Trees and/or Mechanical Tipping of Trees adjacent to stream channels in Riparian Habitat
Since many streams in the project area are deficient in LWD, I am supportive of encouraging the recruitment of LWD or placement of LWD into streams and rivers, where possible. However, I do not support felling and/or mechanical tipping of trees into stream channels without conducting hydrological modeling prior to the tree placement. I am aware of recent experiences in the North Fork Nooksack River system (Ruth Creek near Hannegan Pass Trailhead and NF Nooksack River near Excelsior Group Camp) where the USFS used tree tipping to place large woody debris into streams and rivers for restoration purposes resulted in serious damage to stream channels, stream banks, aquatic habitat, adjacent roads and even the loss of access to an important trailhead. Without conducting hydrological modeling prior to tree placement to estimate storm flows and channel capacity these tree placements will result in more adverse flooding, dam break floods, severe stream bank erosion, and more habitat damage will occur.

Seek Additional Technical Experience for the North Fork Stillaguamish River and Deer Creek Watersheds

I strongly urge you to seek input from experts who have extensive knowledge of the Deer Creek and North Fork Stillaguamish River watersheds. Jim Doyle, retired MBS-NF Forest Fish Biologist, has over 25 years of experience in the Deer Creek watershed and is very familiar with the history of the NWFP designation of Tier 1 Key Watershed for both the North Fork Stillaguamish River and Deer Creek watersheds. In addition, Jim was involved in the development of the 1990 MBS-NF Forest Plan and the forest-wide cumulative effects assessment as well as watershed restoration activities in these two watersheds.

I also urge you to contact Curt Kraemer, retired WDFW area fish biologist, who is very familiar with the Deer Creek, especially the famous (Zane Gray) Deer Creek Summer Steelhead, Bull trout, and Coho salmon in Deer Creek. He also was the key WDFW contact during and after the 1984 De Forest Creek Slide.

Specific Comments
Page 1. 2nd paragraph. Besides working collaboratively with tribal co-managers, the USFS is required to also seek comment from WDFW (see General Comments above).
Page 2. 2nd and 3rd paragraphs. Again, in addition to the tribes, the USFS must also seek input from the other co-manager, WDFW (see General Comments above).
Page 2. 4th paragraph. The only mention of the NWFP but no mention that the North Fork Stillaguamish River Deer Creek watersheds are designated Tier 1 Key Watersheds (see General Comments above).
Page 3. 2nd paragraph. The only mention of "Key Watersheds" but no mention that the North Fork Stillaguamish River Deer Creek watersheds are designated Tier 1 Key Watersheds (see General Comments above).
Page 5. Bullets 1, 3 and 5. Again, in addition to the tribes, the USFS must also seek input from the other co-manager, WDFW. The WDFW has the fish and wildlife population information needed by the USFS in order to have sustainable fish and wildlife populations (see General Comments above).
Page 5. Purpose and Need. I was very surprised to see that there was no mention of the DeForest Creek slide that occurred in 1984 in Deer Creek. As the 1996 Deer Creek Watershed Analysis stated "The DeForest Creek slide in 1984 completely overshadowed previous sediment problems" in Deer Creek.
Page 6. 3rd bullet. Riparian habitat enhancement projects that involve "tree-tipping" need to have hydrologic modeling prior to the tree placement (see General Comments above). Creation of complex riparian structure by thinning in Riparian Reserves sounds great. However, many of these riparian areas are located in very unstable soils and on steep ground, and my concern is that the damage trying to get into these areas to thin trees may be more than the benefits that might take place.
Page 8, 3rd paragraph. This Condition-Based Management (CBM) approach is new to me and it seems to be designed to get around NEPA by allowing proposed treatments to be aligned-post-decision.
Page 8, 4th paragraph. This implies that the specifics of the proposed action would be made after the final EA decision is made, which would eliminate the opportunity for the public to provide comments or submit objections until after the fact. This is counter to the NEPA process.
Page 9. 4th paragraph. In order to create opening suitable for ungulate and deer foraging opportunities, it is critical that WDFW be involved in developing these plans (see General Comments above).
Page 10. 1st paragraph. Top of page. Refers to "Deer and Elk Winter Range (MA-14). It is critical that WDFW be involved in developing these plans (see General Comments above).
Page 10. 3rd paragraph. States "buffers would be designed using CBM and vary by stream type and site-specific conditions." Again, I have concerns about this CBM post-decision approach.
Page 13. 1st paragraph. I am confused by the statement that "proposed actions that could alter public access to system roads or trails would be excluded from utilizing the CBM approach." Explain what this means.
Page 14. 3rd bullet. Only one culvert fish barrier problem is identified, FSR 1755 in Little Deer Creek. The many others shown in Figure 4 need to be more specific in the Draft EA.
Page 14. Last bullet at bottom of page. Identifies increasing LWD, to include "tree tipping" or falling of trees adjacent to targeted channel reaches, to improve aquatic habitat. Again, I have concerns about how this is done and should include hydrologic modeling prior to the tree placement (see General Comments above).
Page 17. 4th paragraph. Proposes trail decommissioning on three trails. I have not been to these sites in many years but I am concerned that a reason they may not have been maintained and have resource issues could be

related to poor road conditions (unmaintained, etc.) may be affecting safe access to the trailheads.  These need to be evaluated further.

Page 18. 3rd and 5th paragraphs. Identifies a number of parking areas along roads and at trailheads to be evaluated that could be designated to accommodate increased recreational use.  Safe road access needs to be provided to these parking sites.

Sincerely, D. Brady Green